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*Attorneys for Defendant and  
 Counterclaim-Plaintiff McAfee, Inc.*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

TVIIM, LLC,

Plaintiff,

v.

MCAFEE, INC.,

Defendant.

**Civil Action No. 3:13-CV-04545-HSG**

**DECLARATION OF JOSEPH J.  
 MUELLER**

1 I, Joseph J. Mueller, declare as follows based on my personal knowledge:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP and  
3 lead counsel for Defendant McAfee, Inc. ("McAfee") in this action. I am licensed to practice  
4 law in the Commonwealth of Massachusetts and have been admitted to practice *pro hac vice*  
5 before the U.S. District Court for the Northern District of California in this action. I am familiar  
6 with the facts set forth herein and, if called as a witness, I could and would testify competently to  
7 those facts under oath.

8 2. I make this declaration in response to the Court's June 19, 2015 Order (Dkt. 213),  
9 which ordered the sealing of certain documents in connection with TVIIM, LLC's  
10 Administrative Motion to File Under Seal (Dkt. 137) and ordered McAfee to publicly file  
11 redacted versions of those documents by June 22, 2015. (Dkt. 213 at 4.) Some of these  
12 documents were originally attached to the Declaration of John Shaeffer in Support of TVIIM,  
13 LLC's Reply in Support of Its Motion to Exclude Certain Expert Testimony of Lance Gunderson  
14 (Dkt. 135) ("Shaeffer Dkt. 136 Declaration"). Accordingly, and in accordance with the Court's  
15 Order, I am attaching true and correct redacted versions of the following documents to be  
16 publicly filed:

- 17 a. Shaeffer Dkt. 136 Declaration **Exhibit A**, described in that declaration as true and  
18 correct copies of the relevant excerpts of the Confidential – Attorneys' Eyes Only  
19 Deposition of Lal Narayanasamy dated December 18, 2014;
- 20 b. Shaeffer Dkt. 136 Declaration **Exhibit B**, described in that declaration as a true  
21 and correct copy of an email dated June 21, 2012, from Mr. Narayanasamy to  
22 Yannick Yu and others, a copy of which was identified as Exhibit 285 in the  
23 Deposition of Mr. Narayanasamy.; and
- 24 c. Shaeffer Dkt. 136 Declaration **Exhibit C**, described in that declaration as a true  
25 and correct copy of an email dated June 30, 2009 from Brian Foster to Ulli  
26 Tanurah and others, which has been designated Confidential – Outside Attorney's  
27 Eyes Only.
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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct to the best of my knowledge.

3  
4  
5 Dated: June 22, 2015

WILMER CUTLER PICKERING HALE  
AND DORR LLP

6 /s/ Joseph J. Mueller

7 Joseph J. Mueller (*pro hac vice*)

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9 *Attorney for Defendant and*  
10 *Counterclaim-Plaintiff McAfee, Inc.*

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**CIVIL LOCAL RULE 5-1(i)(3) ATTESTATION**

I hereby attest that concurrence in this filing had been obtained from Joseph J. Mueller and that records of this concurrence are on file.

Dated: June 22, 2015

/s/ Christine Capuyan

Christine Capuyan

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury under the laws of the United States that a true and correct copy of the above and foregoing document has been served on June 22, 2015 to all counsel of record who are deemed to have consented to electronic service via the Court's ECF system per Civil Local Rule 5-1.

Dated: June 22, 2015

/s/ Christine Capuyan

Christine Capuyan